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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JOHN W.
MCCAULEY IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
OTTO TRUCKING'S MOTION TO
COMPEL**

1 I, John W. McCauley, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its August 16, 2017 Opposition to Otto Trucking’s Motion to Compel (the
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition Letter Brief	Highlighted Portion	Waymo
Exhibit 4 to the Declaration of Jeff Nardinelli	Entire Document	Waymo

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13 3. The highlighted portion of Waymo’s Opposition Letter Brief and Exhibit 4 to the
14 Declaration of Jeff Nardinelli In Support of Waymo’s Opposition (identified in the table above)
15 contain, discuss, or refer to Waymo’s confidential business information, including detailed analysis of
16 Waymo’s security measures and protocols. Specifically, portions of Waymo’s Opposition describe
17 documents that Waymo has produced in this litigation, designated as HIGHLY CONFIDENTIAL –
18 ATTORNEYS’ EYES ONLY under the protective order, that refer to Waymo’s highly confidential
19 security protocols and detailed computer forensics regarding access to Waymo’s trade secrets. Public
20 disclosure of this information to Waymo’s competitors would harm Waymo by giving its competitors
21 access to Waymo’s highly confidential internal business thinking. Waymo’s request to seal is
22 narrowly tailored to only the confidential information.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct, and that this declaration was executed in San Francisco, California, on August 16,
25 2017.

26 By /s/ John W. McCauley

27 John W. McCauley
28 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from John W. McCauley.

/s/ Charles K. Verhoeven
Charles K. Verhoeven